

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF MARYLAND (BALTIMORE DIVISION)

FILED

2015 JUN -9 AM 11:11

RONNIE MOORE
Debtor

CASE NO. 15-11362-NVA DISTRICT OF MARYLAND
Chapter- 13 BALTIMORE

MOTION TO DISMISS COUNSEL AND FOR REFUND OF PAYMENT

COMES NOW, the Debtor, Ronnie Moore requesting that the court grants his Motion to Dismiss Counsel and for a refund of any and all payments made to counsel. Debtor cites the following reasons for his request:

1. Ineffective assistance of counsel.
2. Failure to timely file motions as requested. [BGE]
3. Failure to list BGE, on schedule F when filed.
4. Failure to perform duties as required of a counsel.
5. Failure to communicate with Debtor on matters which are essential to his bankruptcy case.
6. Debtor is also requesting that Counsel return any and all payments made to her as she has not perform the required duties.

WHEREFORE, the Debtor respectfully requests that the court grants his Motion to Dismiss Counsel and for Refund of Payment for the reasons stipulated above.

6-9-15
Date

DR. Ronnie Moore
Ronnie Moore
8624 Vintage Earth Path
Laurel, MD. 20723
(202)499-8416

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of June, 2015, a copy of the Motion to Dismiss Counsel and for Refund of Payment was mailed first class postage prepaid to the following: Hearing date is July 7, 2015. Time 11:15am, in courtroom 2-A. Deadline for objection is July 6, 2015.

Kim Y. Johnson, Esq.
P.O. Box 643
Laurel, MD. 20725-0643

Ellen W. Cosby
Chapter 13 Trustee
300 Joppa Road, Suite 409
Towson, MD 21286

Offices of the U.S. Trustee
101 West Lombard Street
Second Floor
Baltimore, MD 21201

DR. Ronnie Moore
Ronnie Moore
8624 Vintage Earth Path
Laurel, MD. 20723
(202)499-8416